



N-METHYLPYRROLIDONE PRODUCERS GROUP, INC.

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January 5, 2016

Via E-Mail

Ms. Wendy Cleland-Hamnett
Director, Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460-0001

Re: Request for Advance Notice of Proposed Rulemaking Related to
Risk Management Actions for NMP

Dear Ms. Cleland-Hamnett:

The N-Methylpyrrolidone (NMP) Producers Group¹ respectfully requests that the U.S. Environmental Protection Agency (EPA) issue an advance notice of proposed rulemaking (ANPRM) related to risk management actions that EPA is reportedly considering for NMP used in paint removers. Given the anticipated significant consequences of a Section 6 action on the regulated community, coupled with the inexperience of most public stakeholders with Section 6 authorities and impacts, EPA may wish to consider utilizing an ANPRM so it can obtain informed public participation and input before reaching a decision on any specific proposed Section 6 action or other risk reduction approach.

While the intent to form a Small Business Advisory Panel (SBAP) has been announced, it is the NMP Producers Group's understanding that the SBAP group has not yet been formally organized. The feedback from the SBAP group would be greatly enhanced by the views of interested stakeholders on the various options, both regulatory and non-regulatory, that EPA is considering. We note in this regard that on December 10, 2015, Assistant Administrator Jim Jones announced that EPA is considering all "risk reduction actions, both voluntary and regulatory," including those afforded through its Section 6 authorities. We urge EPA to offer all public stakeholders an opportunity to provide feedback on the array of possible options before EPA issues its formal proposed actions, particularly since it has been many years since EPA used Section 6 authorities. The use of an ANPRM would be especially useful given EPA's novel approach to propose action on NMP and methylene chloride together.

¹ The NMP Producers Group includes domestic manufacturers of NMP and was formed to address efficiently and comprehensively regulatory and stewardship issues pertinent to NMP.

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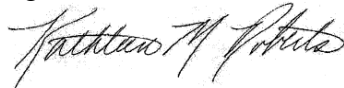
For these reasons, the NMP Producers Group respectfully requests that EPA proceed with an ANPRM related to the potential voluntary and regulatory approaches, including Section 6 actions, for NMP.

In addition or in the alternative, the NMP Producers Group also requests that EPA hold a public meeting in the near future to inform EPA regarding stakeholder thoughts, inputs, or issues to be considered in developing an ANPRM or proposed rule. We note in this regard the EPA-organized workshop that was held this past summer on alternatives to trichloroethylene's (TCE) use as a degreaser and possible risk reduction approaches. We cite that workshop as an example where EPA obtained timely public input on important aspects of its efforts to manage the risks presented by TCE, including both voluntary and regulatory approaches (including TSCA Section 6) that could be applied.

We believe that EPA's efforts to manage the risks of NMP's use as a paint remover would be both assisted and informed by broad and timely public input, particularly when that input can be provided before EPA determines a particular course of action in developing a proposed Section 6 rule.

Thank you for your prompt consideration and response to the points made in this letter. I look forward to hearing back from you regarding this important request.

Regards,



Kathleen M. Roberts
Manager, NMP Producers Group

cc: Tayyaba Waqar, Small Business Administration (via e-mail)